

HAZARDOUS MATERIAL & HAZARDOUS WASTE SECURITY PLAN

*for Complying with
Department of Transportation Regulation
49 CFR 172 - Subpart I*

Applicability

- (1) Highway route-controlled quantity of **radioactive material**.
- (2) More than 25 kg of Division 1.1, 1.2 or 1.3 **explosives**.
- (3) More than 1 L of a material **poisonous by inhalation** in hazard zone A.
- (4) **Bulk packaging** with a capacity of 13,248 L (3,550 gallons) or greater for liquids or gases, or more than 13.24 cubic meters (468 cubic feet) for solids.

- (5) A shipment of 2,268 kg (5,000 lbs.) in **non-bulk packaging** for which placards are required.
- (6) A **select agent or toxin** regulation by the Centers for Disease Control and Prevention under 42 CFR Part 73.
- (7) A quantity of hazardous material that **requires placarding**.

Regulatory Deadlines

- Written Security Plan - 09/25/03
- Security Awareness Training -
03/25/03 thru 03/24/06
- In-depth Security Training - 12/22/03

Minimum Requirements

- Personnel Security
- Unauthorized Access
- En route Security

Preliminary Considerations

- Look at Manifests and Bills of Lading
- Review SPCC Plans, HWMPs, etc.
- Observe Shipments
- Review Contract Requirements
- Review Facility Internal Assessment Plan
- Evaluate Emergency Responder Interface

Scoping Phase Requirements

- Identify HM being transported
- Identify the process for handling HM
- Identify programs already in place
- Identify all players involved
- Identify important risk considerations
- Identify potential victims/receptors
- Specify a time period of analysis

Hazardous Material and Hazardous Waste Security Plan

**Template
for
Naval Facilities**

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I. Security Organization

POSITION	CODE	TELEPHONE
COMMANDING OFFICER	<i>(code)</i>	<i>(10 digit phone)</i>
ENVIRONMENTAL DIVISION HEAD	<i>(code)</i>	<i>(XXX) XXX-XXXX</i>
DIRECTOR OF SECURITY	<i>(code)</i>	<i>(XXX) XXX-XXXX</i>
HAZARDOUS WASTE FACILITY MANAGER	<i>(code)</i>	<i>(XXX) XXX-XXXX</i>
SUPPLY OFFICER	<i>(code)</i>	<i>(XXX) XXX-XXXX</i>
<i>(OTHER POSSIBLE CONTACTS: ROICC, WEAPONS OFFICER, PWC, DRMO, FEDERAL FIRE DEPARTMENT, HUMAN RESOURCES, etc.)</i>	<i>(code)</i>	<i>(XXX) XXX-XXXX</i>

II. Responsibilities

Commanding Officer

- Approves the HM/HW Security Plan and all revisions.

Environmental Division Head

- Prepares and maintains the HM/HW Security Plan.
- Oversees training and retention of training records for HAZMAT employees
- Prepares risk assessment and proposed changes to the security plan.
- Ensures internal compliance with the Security Plan and oversees its verification.

Director of Security

Hazardous Waste Storage Facility Manager and Supply Officer

III. Risk Assessment

- Bases
- Acids
- Flammable Liquids
- Oxidizers
- Compressed gases
- Reactives
- Radioactive Waste
- Munitions
- Fire
- Explosion
- Health

Risk Control Points

- Entrance Gate/Pass Office
- Hazardous Waste Storage Facility
- Hazardous Material Facility
- Any Point Where Truck Is Stopped

IV. Personnel Security

Employee Background Checks

- Gaps in Employment History
- Frequent Job Shifts
- All Names Used By Applicant
- Type Of Military Discharge
- Citizenship
- Present and Prior Residence Information
- Personal References

V. DOT Security Training Requirements

- Transportation Security awareness training
- In-depth security training

VI. Facility Security

- Access To Installation
 - Show ID at Gate
 - Complete inspection
 - Police patrols
- Access To Hazardous Waste Facility
 - Show ID
 - Visitors sign in
 - Gates remain closed

VII. En Route Security

- Locks will be used at all times
- Travel the most direct route
- Do not make unscheduled stops
- Observe suspicious activities
- Maintain a form of communication
- Notify police/facility in case of emergency
- Contract transporters must have their own DOT Security Plan

VIII. Security Breach Procedures

- Report significant security breach to police dispatch
 - Actual or apparent attack
 - Sabotage or attempted sabotage
 - Actual or attempted hijacking
- Report non-significant security breach to facility security manager
 - Unauthorized employee in restricted area

IX. Revisions to Security Plan

- Review once per year
- Review after each significant breach of security
- Revise as Force Protection Levels dictate

X. Recommendations for Improvements

- Install motorized gates at the Hazardous Waste Storage Facility
- Require visitors to sign in and out

QUESTIONS ?

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